



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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March 23, 2020

Via ECF

Honorable Philip M. Halpern
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

In light of the case reassignment, this Court considers the letter dated March 11, 2020 (Doc. 56) withdrawn. Please review and comply with Rule 4(E) of my Individual Practices. The pre-motion conference presently scheduled for 3/25/20 is adjourned *sine die*. The Court will schedule any pre-motion conference in accordance with Rule 2(C).

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: New York, New York
March 24, 2020

Re: Hatches v. Cippollini, et. al., 17 Civ. 6053 (VLB)

Your Honor:

I am an Assistant Attorney General in the Office of Letitia James, Attorney General of the State of New York assigned to defense of this matter. I write today, after conferring with Alan Levine, Attorney for Plaintiff Hatches, to ask for an adjournment of our conference which was previously scheduled for March 25, 2020 at 10:00 a.m.

The reason for this request is that the conference date that was set by Judge Briccetti was supposed to be a conference on this case following the close of discovery. However, pursuant to your Honor's order, dated March 23, 2020, the discovery schedule has changed and the time to complete expert discovery has been extended until May 25, 2020. Dkt. No. 61. We appreciate this extension of time from the court and ask that this conference also be adjourned, to a date convenient for the Court, any time after the close of discovery.

Lastly, I had submitted a letter, dated March 11, 2020, asking for permission to file for summary judgment for some of the defendants in this case. Dkt. No. 56. This letter was submitted in accordance with the schedule that had been set by Judge Briccetti, however, defendants ask that our request to file for summary judgment be stayed until after the close of discovery. I have conferred with counsel for plaintiff about this request and he has consented to my request to complete discovery before we begin summary judgment. Thank you for considering these requests.

Respectfully submitted,

By:



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